

GARMAN TURNER GORDON LLP
 WILLIAM M. NOALL
 Nevada Bar No. 3549
 E-mail: wnoall@gtg.legal
 GABRIELLE A. HAMM
 Nevada Bar No. 11588
 E-mail: ghamm@gtg.legal
 7251 Amigo Street, Suite 210
 Las Vegas, Nevada 89119
 Tel: (725) 777-3000
 Fax: (725) 777-3112
*Attorneys for National Merchandising
 Services, LLC*

ANDERSEN LAW FIRM, LTD.
 RYAN A. ANDERSEN
 Nevada Bar No. 12321
 E-mail: ryan@vegaslawfirm.legal
 3199 East Warm Springs Road
 Las Vegas, Nevada 89120
 Tel: (702) 522-1992

WIGGAM & GEER
 WILL B. GEER
 E-mail: wgeer@wiggamgeer.com
 50 Hurt Plaza, SE, Suite 1245
 Atlanta, Georgia 30303
 Tel: (678) 587-8740
*Attorneys for Edward Steven Burdekin and
 National Store Retail Services*

**UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF NEVADA**

In re:
 NATIONAL MERCHANDISING SERVICES,
 LLC

Case No.: BK-19-15172-ABL
 Chapter 11

Jointly administered with:

☐ Affects this Debtor.

Edward Steven Burdekin,
 Case No. BK-19-15175-ABL; and

☒ Affects all Debtors.

National Store Retail Services, LLC,
 Case No. BK-19-15174-ABL

☐ Affects Edward Steven Burdekin.

Date: July 31, 2020

Time: 9:30 a.m.

Place: U.S. Bankruptcy Court
 Courtroom 1
 300 Las Vegas Boulevard South
 Las Vegas, Nevada

☐ Affects National Store Retail Services,
 LLC.

**NOTICE OF HEARING TO CONSIDER CONFIRMATION
 OF DEBTORS' AMENDED JOINT PLAN OF REORGANIZATION
 AND DEADLINE FOR OBJECTIONS TO CONFIRMATION**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST AND EQUITY
 SECURITIES IN THE DEBTORS, PLEASE TAKE NOTICE THAT:

1. **Debtors' Plan of Reorganization.** Debtors and debtors-in-possession National
 Merchandising Services, LLC ("NMS"), Edward Steven Burdekin ("Burdekin"), and National
 Store Retail Services, LLC ("NSRS") and, collectively with NMS and Burdekin, the "Debtors")

jointly filed *Debtors' Amended Joint Plan of Reorganization* (as may be amended, supplemented, or modified, including all schedules thereto, the "Plan") on June 19, 2020 in the United States Bankruptcy Court for the District of Nevada (the "Court").

2. **Confirmation Hearing.** A hearing to consider confirmation of the Plan (the "Confirmation Hearing") will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada 89101, commencing on **July 31, 2020 at 9:30 a.m.** The Confirmation Hearing may be continued from time to time without further notice other than the announcement by the Court or the Debtors in open court of the adjourned date at the Confirmation Hearing or any continued hearing, and the Plan may be modified, if necessary, prior to, during, or as a result of the Confirmation Hearing in accordance with the terms of the Plan, without further notice to interested parties. ***Pursuant to LR 3019, all creditors and parties in interest are advised that the Court may consider modifications to the Plan at the Confirmation Hearing.***

3. **Objections to Plan Confirmation, Assumption and Assignment of Contracts and Leases, and Cure Amounts.** If you do not want the court to confirm the Plan, including the assumption or assignment of an executory contract or unexpired lease, or if you want the Court to consider your views on the Plan, including any objection to a cure amount proposed by the Debtors in the Plan, then you must file an opposition with the Court, and serve a copy on attorneys for the Debtors, ***no later than 14 days*** preceding the Confirmation Hearing date, unless an exception applies (*see* Local Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local rule 9014(c).

If you object to the relief requested, you *must* file a **WRITTEN** response to the Plan with the Court. You *must* also serve your written response on the persons who sent you this notice.

If you do not file a written response with the Court, or if you do not serve your written response on the person who sent you this notice, then:

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* without formally calling the matter at the hearing.

4. **Additional Information; Copies of the Plan.** A copy of the Plan may be obtained free of charge on the case website at www.donlinrecano.com/nms and is on file with the Court. Any person wishing to obtain information regarding the Plan or a copy of the Plan may also contact counsel for the Debtors, William M. Noall, Esq., at (725) 777-3000 or via email at wnoall@gtg.legal, or Will Geer, Esq., at (678) 587-8740 or via email at wgeer@wiggamgeer.com.

Dated June 19, 2020.

1 GARMAN TURNER GORDON

ANDERSEN LAW FIRM, LTD.

2 By: /s/ William M. Noall

By: /s/ Ryan A. Andersen

3 WILLIAM M. NOALL

RYAN A. ANDERSEN

4 Nevada Bar No. 3549

Nevada Bar No. 12321

5 GABRIELLE A. HAMM

ryan@vegaslawfirm.legal

6 Nevada Bar No. 11588

3199 East Warm Springs Road

7 7251 Amigo Street, Suite 210

Las Vegas, Nevada 89120

8 Las Vegas, Nevada 89119

Tel: (702) 522-1992

9 Tel: (725) 777-3000

- and -

10 wnoall@gtg.legal

WIGGAM & GEER

11 ghamm@gtg.legal

WILL B. GEER

12 Attorneys for Debtor National

wgeer@wiggamgeer.com

13 Merchandising Services, LLC

50 Hurt Plaza, SE, Suite 1245

Atlanta, Georgia 30303

14 Tel: (678) 587-8740

15 Attorneys for Debtors Edward Steven

16 Burdekin and National Store Retail Services